

In The Matter Of:

*EDWARD CARTER, FRANK FIORILLO, KEVIN LAMM, v.
INCORPORATED VILLAGE OF OCEAN BEACH*

*THOMAS SNYDER
September 24, 2008*

*Precise Court Reporting
200 Old Country Road
Suite 110
Mineola, NY 11501
(516) 747-9393*

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Word Index included with this Min-U-Script®

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[1]
[2] UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
[3] -----X
EDWARD CARTER, FRANK FIORILLO, KEVIN LAMM,
[4] JOSEPH NOFI, and THOMAS SNYDER,
Plaintiffs,
[5] -against- Case No. 07-Civ-1215
(SJF)(ETB)
[6] INCORPORATED VILLAGE OF OCEAN BEACH; MAYOR
JOSEPH C. LOEFFLER, JR., individually and in
[7] his official capacity; former mayor NATALIE
K. ROGERS, individually and in her official
[8] capacity; OCEAN BEACH POLICE DEPARTMENT;
ACTING DEPUTY POLICE CHIEF GEORGE B. HESSE,
[9] individually and in his official capacity;
SUFFOLK COUNTY; SUFFOLK COUNTY POLICE
[10] DEPARTMENT; SUFFOLK COUNTY DEPARTMENT: OF
CIVIL SERVICE; and ALISON SANCHEZ,
[11] individually and in her official capacity,
Defendants.
[12] -----X
[13] 926 Reckson Plaza
[14] Uniondale, New York
[15]
[16] September 24, 2008
[17] 10:17 A.M.
[18]
[19] VIDEOTAPE DEPOSITION of THOMAS
[20] SNYDER, taken pursuant to the Federal Rules
[21] of Civil Procedure, and Notice, held at the
[22] above-mentioned time and place before Edward
[23] Leto, a Notary Public of the State of New
[24] York.
[25]

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[1]
[2] APPEARANCES:
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[8] Jr., former Mayor Natalie K.
Rogers, and Ocean Beach Police
[9] Department
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BY: KENNETH A. NOVIKOFF, ESQ.
[11] -and-
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[17] Attorneys for Defendants Suffolk
County, Suffolk County Police
[18] Department, Suffolk County
Department of Civil Service, and
[19] Alison Sanchez
100 Veterans Memorial Highway
[20] Hauppauge, New York 11788
BY: CHRISTOPHER M. GATTO, ESQ.
[21]

ALSO PRESENT

[22] Albert Santana, Legal Video Specialist
[23]
[24]
[25]

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T. Snyder

[1] *T. Snyder*
[2] **A:** No, I have not.
[3] **MR. NOVIKOFF:** Let's mark the
[4] following document as Snyder-1.
[5] (Suffolk County Application For
[6] Employment was marked as Snyder
[7] Exhibit-1 for identification;
[8] 9/24/08, E.L.)
[9] **Q:** Sir, I'm showing you what's been
[10] marked as Snyder-1, and for the record, it's
[11] a four-page document. On the first page
[12] it's entitled "Suffolk County Application
[13] For Employment, Open-Competitive
[14] Examinations and Non-Competitive
[15] Appointments."
[16] **MR. GOODSTADT:** Just before you
[17] answer, do we have the Bates stamp
[18] numbers?
[19] **MR. NOVIKOFF:** The copy I have
[20] does not have a Bates stamp, but I
[21] believe it has been produced.
[22] **MR. WELCH:** Yes. I believe so.
[23] **MR. NOVIKOFF:** And we'll try to
[24] get you those Bates stamp numbers
[25] before the end of the day.

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T. Snyder

[1] *T. Snyder*
[2] **Q:** And the last page starts with on
[3] top saying "be sure to sign the declaration
[4] at the bottom of this page. Unsigned
[5] applications will be declared illegible."
[6] There is a date of 7/24/04 and a signature
[7] which appears to be that of Thomas A.
[8] Snyder. Do you maintain the document that
[9] I've just described in front of you right
[10] now as Snyder-1?
[11] **A:** Yes. That's my signature.
[12] **Q:** You anticipated my question. Is
[13] that your signature on the last page?
[14] **A:** Yes, it is.
[15] **Q:** And the 7/24/04 reflects the date
[16] upon which you signed this document?
[17] **A:** Yes, it does. If that's when I
[18] signed my signature, yes.
[19] **Q:** Do you recall — and for the
[20] record, it appears that this is Bates stamp
[21] number 009776 through 9779. And do you
[22] recall why you would have executed this
[23] application on or about July 24, 2004?
[24] **A:** No, I don't recall what this was
[25] for.

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T. Snyder

[1] *T. Snyder*
[2] **Q:** Okay. And do you see above your
[3] signature, it says "declaration"?
[4] **A:** Yes, I do.
[5] **Q:** And it starts "I declare subject
[6] to the penalties of perjury," do you see
[7] that?
[8] **A:** Yes, I do.
[9] **Q:** And do you understand what the
[10] penalties of perjury means, meant as it was
[11] stated in this document?
[12] **A:** Yes, I do.
[13] **Q:** What was your understanding?
[14] **A:** That if you — you lied, you
[15] know, signed this document and you lied,
[16] that you could be held liable for it.
[17] **Q:** Now, sir, at any point in time in
[18] your life, were you a member of the
[19] military?
[20] **A:** Yes, I was.
[21] **Q:** And for whom were you a member
[22] of?
[23] **A:** I served with the United States
[24] Navy.
[25] **Q:** And for how many years?

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T. Snyder

[1] *T. Snyder*
[2] **A:** I think it was maybe just a
[3] little less than four years actually.
[4] **Q:** And were you discharged?
[5] **A:** Yes, I was.
[6] **Q:** And were you discharged for bad
[7] conduct?
[8] **A:** That's correct.
[9] **Q:** And were you convicted by a
[10] general court marshal?
[11] **A:** In general court marshal. That's
[12] correct. Yes.
[13] **Q:** Okay. Now, sir, let's look back
[14] at Snyder-1. The first page, seven, "check
[15] appropriate box to the right of each
[16] question," do you see that?
[17] **A:** Yes, I do.
[18] **Q:** E, "did you ever receive a
[19] discharge from the armed forces of the
[20] United States which was other than honorable
[21] or which was issued under other than
[22] honorable circumstances," do you see that?
[23] **A:** Yes, I do.
[24] **Q:** And you checked "no," do you see
[25] that?

Page 15

[1] *T. Snyder*
[2] make a motion to strike, based upon
[3] what we did the last depositions,
[4] you're reserving your rights to object
[5] to that motion.
[6] Q: Sir, on this document, is there
[7] any reference to you stating that you were
[8] discharged for bad conduct?
[9] MR. GOODSTADT: Objection. The
[10] documents speaks for itself.
[11] Q: Is there anything on this
[12] document?
[13] A: Not on this front page.
[14] Q: Well, take a whole look at the
[15] document.
[16] A: I don't see anywhere on — in any
[17] four of these documents anywhere where it
[18] says anything that's written about that.
[19] Q: In the "comments" section, you
[20] don't make reference to the fact that you
[21] were convicted — and let me just get the
[22] right wording — you were convicted by a
[23] general court marshal, do you?
[24] A: No, because they didn't ask that
[25] question.

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[1] *T. Snyder*
[2] Q: Sir, you wrote the comment,
[3] right?
[4] A: That was the reason why I was
[5] discharged.
[6] Q: Okay.
[7] A: It was my understanding when I
[8] checked "yes," that I had to explain why I
[9] was discharged. That was the reason why I
[10] was discharged.
[11] Q: Then you put a comment down, sir,
[12] "I was discharged from the United States
[13] Navy due to a hardship at home with family,"
[14] do you see that?
[15] A: That's correct.
[16] Q: Didn't say anything about being
[17] convicted at a general court marshal?
[18] MR. GOODSTADT: Objection.
[19] Q: Did you?
[20] A: There's no question that asked me
[21] that, but I did explain it in the interview.
[22] I had to explain what happened in my
[23] discharge.
[24] Q: On this document?
[25] MR. GOODSTADT: Objection.

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[1] *T. Snyder*
[2] A: It's not stated anywhere on this
[3] document, sir, so no, I wouldn't write that
[4] there. But during the verbal interview with
[5] Chief Loeffler and Sergeant Paradiso, I did
[6] explain — in fact, gave them a copy of my
[7] discharge.
[8] MO MR. NOVIKOFF: Motion to strike
[9] as nonresponsive.
[10] Q: Sir, why were you convicted by
[11] general court marshal?
[12] A: For what it says right here. I
[13] was AWOL because I had problems at home with
[14] my family and I was very young and immature
[15] and I could not deal with being in the navy
[16] and being away from my family at home.
[17] I came home to help my mom is
[18] what I did, all right. My pay had gotten
[19] screwed up in the navy and it was taking
[20] months to get it straightened out. I was
[21] sending money home to help her and I
[22] couldn't do it, so 19 years old and being a
[23] little immature at that age, I made a very
[24] rash and unwise decision.
[25] Q: Okay. Which you exacerbated by

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[1] *T. Snyder*
[2] lying on an application?
[3] DI MR. GOODSTADT: Objection.
[4] Don't answer that. That's harassing.
[5] Q: Sir, did you lie on any of the
[6] two applications I've shown you?
[7] A: No, I didn't lie.
[8] Q: Okay. And let's see. And did
[9] you have a trial by this court marshal?
[10] A: I don't recall exactly. Yeah,
[11] there was a trial, but it was — it seemed
[12] very informal to me. It was only several
[13] people in the —
[14] Q: Okay.
[15] A: It was a general court marshal.
[16] That's what they called it.
[17] Q: And were you represented by
[18] counsel at the time?
[19] A: By the military. By a marine
[20] corps.
[21] Q: So you had counsel at the time?
[22] A: He was a marine corps attorney I
[23] would assume, yeah.
[24] Q: Okay. And other than being
[25] discharged dishonorably, were there any

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[1] *T. Snyder*
[2] Q: Have you spoken with any of the
[3] other Plaintiffs within the last month
[4] concerning this lawsuit, outside the
[5] presence of your counsel?
[6] A: I've spoken to Frank and Kevin.
[7] We're friends. We do talk.
[8] Q: I'm sure you do talk. My
[9] question is more specific, about this
[10] lawsuit?
[11] A: No, we have not.
[12] Q: Okay. When is the last time
[13] you've spoken to Kevin about this lawsuit
[14] outside the presence of your attorney?
[15] A: I have no idea. Probably several
[16] weeks ago.
[17] Q: And what was the substance of
[18] that conversation?
[19] A: Just how — when our depositions
[20] are going to be scheduled and who can make
[21] it and who can't.
[22] Q: Okay. With regard to
[23] Mr. Fiorillo, have you discussed —
[24] A: Same exact conversation was going
[25] on.

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[1] *T. Snyder*
[2] MR. GOODSTADT: Again, just let
[3] him finish the question.
[4] THE WITNESS: Oh, I'm sorry.
[5] MR. GOODSTADT: You don't know
[6] what he's actually asking until he
[7] ends.
[8] MR. NOVIKOFF: I generally
[9] don't know what I'm asking until I end.
[10] Q: With regard to Mr. Fiorillo, when
[11] was the — when was the last time that you
[12] have spoken with him concerning this
[13] litigation, outside the presence of your
[14] counsel?
[15] A: Within the last several weeks
[16] when he told me about the deposition
[17] schedule and whether or not I was available.
[18] Q: Okay. And prior — other than
[19] talking about deposition scheduling, when's
[20] the last time you had spoken with Mr. Lamm
[21] concerning the substance of this litigation?
[22] A: I haven't.
[23] MR. GOODSTADT: Again, with the
[24] same caveat, outside the presence of
[25] counsel?

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[1] *T. Snyder*
[2] MR. NOVIKOFF: Yes.
[3] Absolutely.
[4] A: I haven't talked to him about it
[5] at all recently.
[6] Q: When you say "recently," what do
[7] you mean?
[8] A: Well, the last time I did talk
[9] about it was when we met with counsel.
[10] Q: Okay. I'm talking outside the
[11] presence of your counsel —
[12] A: I have not —
[13] Q: — whether in person or over the
[14] phone?
[15] A: I have not spoken to him about
[16] it.
[17] Q: Over how long a period of time?
[18] A: Probably several months. The
[19] last time, again, was when we — that was
[20] back in August.
[21] MR. GOODSTADT: Don't. Don't.
[22] Q: Same question with regard to
[23] Fiorillo?
[24] A: Same thing. Exact same thing.
[25] Q: And same question with regard to

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[1] *T. Snyder*
[2] Carter?
[3] A: Same thing with Eddie and the
[4] same with Joe.
[5] MR. NOVIKOFF: Okay. Let's
[6] mark the following document as
[7] Snyder-4.
[8] (Document Bates stamped 009735
[9] was marked as Snyder Exhibit-4 for
[10] identification; 9/24/08, E.L.)
[11] Q: Do you recall when Snyder-4 was
[12] taken?
[13] A: No, I do not.
[14] Q: Do you know how long ago?
[15] A: I have no idea, sir.
[16] MR. GOODSTADT: For the record,
[17] I'll be willing to stipulate that he
[18] was bald in this picture.
[19] MR. NOVIKOFF: You got it. We
[20] don't have to go through what we went
[21] through with Mr. Carter with the hair.
[22] That's fine.
[23] Q: Before we get to the complaint,
[24] sir, you worked for Ocean Beach starting
[25] when?

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T. Snyder

[1] vote in this PBA.
[2]
[3] Q: So because you were told that you
[4] were — I just want to understand this. Is
[5] it your testimony that because you were told
[6] by someone that the village was going to
[7] layoff the part-time cops, you decided to
[8] quit?
[9] A: Well, they did layoff some of the
[10] part-time cops that I was working with
[11] there, so I was probably going to be next.
[12] Q: So before they laid you off, you
[13] decided to quit?
[14] A: I told them that I didn't — I
[15] enjoyed working for the village, I have a
[16] good rapport with the village administration
[17] and the people in the police department, and
[18] I didn't want to cause any problems, I
[19] didn't want to get laid off, so I would just
[20] resign my position.
[21] Q: Okay. And what precipitated you
[22] in asking to come back how many years later?
[23] A: Actually, I had a meeting with Ed
[24] Paridiso, the chief of police. He had saw
[25] me one day — actual — and he said to me,

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T. Snyder

[1] "Tom, you know, I'm looking for experienced
[2] police officers. I would like to rehire
[3] you. Are you willing to come back and work
[4] for me?"
[5] Q: And what did you say?
[6] A: I said, "Sure." And I asked him
[7] some questions about, you know, the pen and
[8] he — how the situation is over there with
[9] the PBA and all that.
[10] Q: And when did this take place?
[11] A: In May or — I think it was early
[12] June of 2001.
[13] Q: Okay. Now in the interim,
[14] whatever period of time that was when you
[15] weren't working for Ocean Beach, did you
[16] seek employment with any other law
[17] enforcement agency?
[18] A: No, I did not at that time.
[19] Q: Okay. Prior to you quitting,
[20] whenever that was in the '90s — I think we
[21] all agree it took place in the '90s —
[22] between your first day that you worked for
[23] Ocean Beach and your last day during your
[24] first go around with them, had you applied

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T. Snyder

[1] for any other law enforcement jobs?
[2] A: Yes, I did. I — the New York
[3] City Police Department.
[4] Q: When did you apply for the New
[5] York City Police Department?
[6] A: I want to say 1992 or '93.
[7] Q: And what did you have to do to
[8] apply for a position with the New York City
[9] Police Department?
[10] A: Basically the same requirements
[11] as if you applied for a position as a
[12] Suffolk County police officer or any police
[13] officer. You would have to take a test,
[14] pass it, and then go through all the — the
[15] background qualifications.
[16] Q: And did you take the test?
[17] A: Yes, I did.
[18] Q: Did you pass the test?
[19] A: Yes, I did.
[20] Q: And did you go through all the
[21] background tests that were required?
[22] A: I didn't did go through all of
[23] them. I went through half of them and then
[24] during the course of going through them, I
[25]

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T. Snyder

[1] changed my idea and decided I didn't want to
[2] go to New York City anymore. So I removed
[3] myself from consideration.
[4] Q: Okay. And had you failed any of
[5] the other tests —
[6] A: No, I had not.
[7] Q: — that you had taken?
[8] A: No, I had not.
[9] MR. GOODSTADT: Just let him
[10] finish the question.
[11] Q: Were you advised — other than
[12] the test that you say you passed, were you
[13] advised, up until the time you decided to
[14] pull your name from consideration, that you
[15] had either passed or failed any test?
[16] A: I had gone for my medical and
[17] they didn't tell me that I had failed it.
[18] Q: Did they tell you you had passed
[19] it?
[20] A: I don't recall.
[21] Q: Did you get the results back?
[22] A: Honestly, I don't recall
[23] honestly. It's been so long ago. I really
[24] don't recall.
[25]

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T. Snyder

[1] *T. Snyder*
[2] Q: Sir, I'm showing you what's been
[3] marked as Snyder-6 and I — and I purport
[4] that this is a true and accurate copy of the
[5] complaint that was filed on your behalf in
[6] or about on March 21, 2007. Have you seen
[7] this document prior to today?
[8] A: Oh, yes, I have.
[9] Q: Did you review this document
[10] prior to its filing on March 21, 2007?
[11] A: It was reviewed, yes.
[12] Q: Did you review it?
[13] A: I don't recall if I reviewed it
[14] or not prior to it being filed.
[15] Q: So when you just testified that
[16] it was reviewed, who were you — what were
[17] you referring to?
[18] A: I would assume my attorneys
[19] reviewed it before they filed it.
[20] Q: Okay. But you don't recall if
[21] you reviewed it?
[22] A: I don't recall if I reviewed just
[23] right prior to it being filed.
[24] Q: I'm asking did you review any
[25] drafts of the complaint prior to it being

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T. Snyder

[1] *T. Snyder*
[2] filed?
[3] A: A draft of it, yes.
[4] Q: That's what I'm saying.
[5] A: Okay. Yes.
[6] Q: Okay. And would you consider
[7] this document to be an important document?
[8] A: Yes, I would.
[9] Q: Would you agree with me that one
[10] of the reasons you wanted to review the
[11] document was to make sure that everything in
[12] there was accurate to the best of your
[13] recollection?
[14] A: Yes.
[15] Q: And was it important that
[16] everything in there be accurate to the best
[17] of your recollection?
[18] A: Yes.
[19] Q: And it would be important that if
[20] there was a mistake in there as to a fact
[21] that you were aware of, that you would not
[22] want that mistake to be filed?
[23] A: Yes.
[24] Q: And did you, when you reviewed
[25] the draft, notice any mistakes or

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T. Snyder

[1] *T. Snyder*
[2] misrepresentations of the facts as you knew
[3] them to be?
[4] MR. GOODSTADT: Objection. I'm
[5] going to instruct the witness not to
[6] answer the question. That's work
[7] product and attorney/client
[8] communication.
[9] MR. NOVIKOFF: I'm just —
[10] Andrew, I'm just asking him if he
[11] noticed it. I'm not going to ask what
[12] he did with it, who he talked to about
[13] it. Just want — I think it's an
[14] appropriate question to ask.
[15] MR. GOODSTADT: The question is
[16] whether he noticed any —
[17] MR. NOVIKOFF: Whether in any
[18] draft that he looked at, did he see any
[19] mistake or misrepresentation of a fact
[20] that he was aware of.
[21] MR. GOODSTADT: I'll let you
[22] answer yes or no on that or you don't
[23] recall.
[24] A: I don't recall, to be honest with
[25] you.

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T. Snyder

[1] *T. Snyder*
[2] Q: Okay. And as the facts as
[3] alleged pertaining to you specifically,
[4] everything that is set forth in this
[5] complaint is true and accurate, correct?
[6] MR. GOODSTADT: And we're
[7] talking about the filed complaint?
[8] MR. NOVIKOFF: The filed
[9] complaint.
[10] A: Yes.
[11] Q: Right. Let's look at paragraph
[12] 109. Actually, you know what, before we get
[13] to 109, this was filed March 21, 2007. Did
[14] you all have a press conference subsequent
[15] to filing this complaint?
[16] A: I believe it was after the
[17] complaint was filed.
[18] Q: After?
[19] A: Yeah.
[20] Q: And were you — did you
[21] participate in that press conference?
[22] A: Yes, I did.
[23] Q: And were there television cameras
[24] at that press conference?
[25] A: Yes, there were.

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[1] *T. Snyder*
[2] A: Same with him as well.
[3] Q: Same question with regard to
[4] Carter?
[5] A: Eddie Carter was a little
[6] different. Eddie Carter, they I think
[7] reached out to him with regard to a separate
[8] incident in Ocean Beach where they
[9] mistakenly thought he was involved in.
[10] Q: Well, my question was if
[11] Mr. Carter reached out to the DA's office
[12] unsolicited. Are you aware as to whether he
[13] did that?
[14] A: I'm not aware of that, no.
[15] Q: Okay. Now, so the DA called you
[16] up and left a message?
[17] A: That's correct.
[18] Q: And did you respond to that
[19] message?
[20] A: Yes, I did.
[21] Q: How did you respond?
[22] A: I called them back and asked what
[23] they wanted to speak about and why they
[24] wanted me to come in.
[25] Q: And who did you speak with?

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[1] *T. Snyder*
[2] A: Tom Iacopelli, the guy who left a
[3] message initially.
[4] Q: And what did — what did this
[5] gentleman by the name Tom say to you when
[6] you called back?
[7] A: He said to me that he had heard I
[8] was recently fired from Ocean Beach and that
[9] he wanted me to come in because he thought I
[10] had some information that could help them
[11] with regard to investigations that were
[12] occurring in Ocean Beach.
[13] Q: What investigations?
[14] A: He didn't name them specifically.
[15] Q: Did you ask?
[16] A: I didn't ask on the phone, no.
[17] Q: And what — what transpired —
[18] well, did he say anything else about what
[19] they were investigating Ocean Beach about,
[20] other than what you've just testified to?
[21] A: No, he didn't. We just set up
[22] when it was convenient for me to come in.
[23] We set up a date.
[24] Q: And when did that take — that
[25] meeting take place?

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[1] *T. Snyder*
[2] A: Soon after that phone call. I'm
[3] not sure exactly when.
[4] Q: Days? Weeks? Months?
[5] A: I think it was days after. Maybe
[6] even a week.
[7] Q: When — where did you meet?
[8] A: In the Suffolk District
[9] Attorney's office.
[10] Q: Who was present at this meeting?
[11] A: The people I stated before. ADA
[12] Ray Tierney, Tom Iacopelli, Walter
[13] Warkenthien, John Burke, and there was
[14] several others, but I don't recall their
[15] names.
[16] Q: Prior — and was this — would
[17] this meeting have taken place before you
[18] filed the Notice of Claim in this case?
[19] A: Before — yes, it did. Yes.
[20] Because we filed this in 2007, yes.
[21] Q: No. This is the complaint
[22] (indicating). You filed a Notice of Claim
[23] in 2006 and I believe it was sometime in the
[24] June, July time frame. If I gave you the
[25] June, July time frame as a point of

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[1] *T. Snyder*
[2] reference —
[3] A: Right.
[4] Q: Was your first face-to-face
[5] meeting with any member of the Suffolk
[6] County DA prior to you filing your Notice of
[7] Claim?
[8] A: I'm not sure if it was prior to
[9] or right after, but it was very — both of
[10] them were very close together.
[11] Q: Had you retained counsel,
[12] Mr. Goodstadt's office, prior to your first
[13] meeting with the Suffolk County District
[14] Attorney's office?
[15] A: I don't recall if it was right
[16] before or right after.
[17] Q: Okay. So you don't know as you
[18] sit here today, as to whether or not
[19] Mr. Goodstadt's law firm was representing
[20] you when you first met with the DA's office?
[21] A: I don't recall exactly. No.
[22] Q: Okay. So you had this meeting
[23] with ADA Tierney and a number of other
[24] individuals, correct?
[25] A: That's correct.

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[1] *T. Snyder*
[2] knowledge?
[3] MR. GOODSTADT: Objection.
[4] Q: Of what took place or didn't take
[5] place during that incident?
[6] A: Not my — not my direct personal
[7] knowledge, but.
[8] Q: That's all I'm asking about, your
[9] direct personal knowledge.
[10] A: No. I wasn't present during that
[11] incident. I was not working that night.
[12] Q: Okay. You weren't even on the
[13] beach that night?
[14] A: No, I was not.
[15] Q: Okay. And would it also be fair
[16] to say that anything you told the District
[17] Attorney regarding the Halloween incident
[18] that took place in the bar, was not based
[19] upon your direct personal knowledge, but
[20] based upon your investigation?
[21] MR. GOODSTADT: Objection.
[22] Q: Correct?
[23] MR. GOODSTADT: Objection.
[24] A: I would say that that was more my
[25] direct knowledge. I was working and I was

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[1] *T. Snyder*
[2] called to the scene to investigate that.
[3] Q: Right. But you weren't present
[4] when the alleged incident took place, were
[5] you?
[6] A: I wasn't present when the alleged
[7] incident took place, no.
[8] Q: Okay. All right. So we've
[9] now — we've now talked about this first
[10] meeting. Well, during this first meeting,
[11] did you — well, withdrawn. When was the
[12] next time that you spoke with any person
[13] associated with the Suffolk County DA's
[14] office concerning Ocean Beach?
[15] A: Um, I think it was several weeks
[16] later. Two or three weeks later.
[17] Q: And with whom did you have this
[18] conversation or meeting with?
[19] A: With Tom Iacopelli.
[20] Q: Over the phone or in person?
[21] A: I had called him. I had called
[22] him over the phone and asked to come in to
[23] see him.
[24] Q: Why did you call Mr. Iacopelli
[25] over the phone to ask to come in to see him?

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[1] *T. Snyder*
[2] A: I had found a letter that I
[3] received, a threatening letter I received in
[4] the mail prior to that that I felt that they
[5] needed to look at because it came from Ocean
[6] Beach.
[7] Q: A threatening letter?
[8] A: Yes.
[9] Q: Was — did you receive this
[10] threatening letter before or after you had
[11] retained Mr. Goodstadt's law firm?
[12] A: I received it before.
[13] Q: Okay. So if you had received —
[14] did you receive this threatening letter
[15] before your first meeting with ADA Tierney
[16] and the others that we've just discussed?
[17] A: Yes, I did.
[18] Q: Did you bring this letter up to
[19] them during this meeting?
[20] A: I may have. I don't recall if I
[21] did.
[22] Q: Is there a reason why you didn't
[23] bring this letter to the first meeting that
[24] you had with ADA Tierney and the others?
[25] A: I just stated that I just

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[1] *T. Snyder*
[2] recently had found it after I had spoken to
[3] them and wanted to show this to them.
[4] Q: When you say you had just
[5] recently found it, what does that mean?
[6] A: Among my documents at home. I
[7] didn't — I was looking through it and I
[8] found the thing and I said oh, I want to
[9] bring this to them and let them know what
[10] happened here.
[11] Q: When did you receive this letter?
[12] A: Um, several months after the
[13] Halloween incident.
[14] Q: Oh okay. So this was a letter
[15] that you had received prior to the — your
[16] last day of employment in March or —
[17] A: Yes.
[18] Q: — April of 2006?
[19] A: Yes.
[20] Q: Okay. And do you know if you've
[21] produced this letter in the course of
[22] discovery?
[23] A: Yes, I did.
[24] RQ MR. NOVIKOFF: Okay. Well, I
[25] don't know if we've — I don't believe